

WHAT IS THE PURPOSE OF THIS DOCUMENT?

BOWSERS are Solicitors authorised and regulated by the Solicitors Regulation Authority ("the SRA"). Its regulations include all the most important principles by which we work, one of which is that we must act in the best interests of the client. That means, among many matters, keeping confidential all matters relating to our clients.

The General Data Protection Regulations ("GDPR") apply to all businesses who collect and use personal information, which includes us and the information we hold about you. It follows that we are required by the GDPR to tell you how we hold and use that information. It in no way alters our duties of client confidentiality, it is explaining it.

BOWSERS is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read and retain this notice, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:-

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about you from which you can be identified. It does not include data where your identity is impossible to know (anonymous data).

We will collect, store, and use the following categories of personal information about you:-

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- National Insurance number.

- Bank account details.

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

We do not collect, store or use any "special categories" of more sensitive personal information without your consents:

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We only collect personal information about you from you.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:-

1. Where we need to perform the contract we have entered into with you;
2. Where we need to comply with a legal obligation;
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:-

1. Where we need to protect your interests (or someone else's interests);
2. Where it is needed for official purposes.

The purposes for which we will need your personal information will always be:-

Either, because we need it to be able to carry out work for you;
or, because we have to comply with a legal obligation;
or, because there is some other very good reason and you have given your permission.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

INFORMATION ABOUT CRIMINAL CONVICTIONS

On rare occasions, we may use information relating to criminal convictions where it is necessary in relation to legal claims and, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will hold information about criminal convictions but if we have to, we will only collect information about criminal convictions if it is appropriate given the nature of the role and we are legally able to do so.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We will not transfer your personal information outside the EU without your consent.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might we share your personal information with third parties?

We will share your personal information with a third party only where required by law or where it is necessary to administer the working relationship with you, e.g. to give the Land Registry your home address.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those people who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Director of Administration.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the Director of Administration.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without getting any further permission.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are using it correctly.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes, which we do not use.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Director of Administration in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate

security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Director of Administration.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact our Director of Administration.

I, _____ (name), acknowledge that on _____ (date), I received a copy of Bowser's privacy notice for clients and that I have read and understood it.

Signature

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